UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)

IN RE:

CHAPTER 13

Richard Anthony Rutgers Elva Mae Rutgers

CASE NO.: 19-17402-pmm

1ae Rutgers
Debtors

HEARING DATE: March 30, 2021

TIME: 10:00am

LOCATION: 4th Floor

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2016-1 ("Movant") has filed a Motion for relief from the automatic stay provisions of 11 U.S.C. § 362(a) with respect to real Mortgaged Premises located at 5120 Curly Horse Drive, Center Valley, PA 18034.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before March 23, 2021, you or your attorney must do **all** of the following:
 - (a) file an answer explaining your position at:
 U.S. Bankruptcy Court
 Eastern District of Pennsylvania
 The Gateway Building
 201 Penn Street, Suite 103
 Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's Attorney: Hill Wallack, LLP 777 Township Line Road, Suite 250 Yardley, PA 19067 215-579-7700 (215)579-9248 (FAX)
- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Judge Patricia M. Mayer on March 30, 2021 at 10:00am in The Gateway Building, 201 Penn Street, 4th Floor Courtroom, Reading, PA 19601. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).
- 4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ Angela C. Pattison
Angela C. Pattison, Esq.,
Attorney ID 307611
Hill Wallack, LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034
Telephone 856-616-8086
Facsimile 856-616-8081

Email: apattison@hillwallack.com